

W. SCOTT HEMPHILL  
517 Riblett Lane  
Wilmington, DE 19808

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LANCASTER COMPOSITE, INC., ) Case No.: No. 04-1414 SLR  
Plaintiff, )  
vs. ) RESPONSE TO COMPLAINT  
HARDCORE COMPOSITES OPERATIONS, LLC , )  
and W. SCOTT HEMPHILL, )  
Defendant )

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
2005 MAR 11 PM 2:18

## RESPONSE TO CLAIMS

## COUNT 1

Infringement of U.S. Patent No. 5,800,889

13. Denied, ~~Lancaster Composite~~ is not listed as either the inventor or the assignee of U.S Patent 5,800,839 ('889 patent).

14. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '889 patent.

15. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '839 patent.

16. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '889 patent.

17. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '889 patent.

18. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites. offered to sell a product described by the '889 patent.

19. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites. offered to sell a product described by the '889 patent.

20. Denied. The Hardcore Composites pile is not described by the '889 Patent.

21. Denied. Hardcore Composites has not infringed said patent.

22. Denied. Hardcore Composites has not infringed said patent.

23. Denied. Hemphill has not personally prepared each quote.

24. Denied. Hardcore Composites has not infringed said patent.

25. Denied. The Hardcore Composites pile is not described by the '889 Patent.

26. Denied. Hardcore Composites and Hemphill have not infringed said patent.

27. Denied. Hardcore Composites and Hemphill have not infringed said patent,

therefore there is no basis for belief that there will be future infringement.

## COUNT II

### Infringement of U.S. Patent No. 6,048,594

28. Admitted.

29. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '594 patent.

30. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '594 patent.
31. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '594 patent.
32. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites offered to sell a product described by the '594 patent.
33. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites. offered to sell a product described by the '889 patent.
34. Denied. Defendant W.Scott Hemphill has no knowledge that Hardcore Composites. offered to sell a product described by the '889 patent.
35. Denied. The Hardcore Composites pile is not described by the '889 Patent.
36. Denied. Hardcore Composites has not infringed said patent.
37. Denied. Hardcore Composites has not infringed said patent.
38. Denied. Hemphill has not personally prepared each quote.
39. Denied. Hardcore Composites has not infringed said patent.
40. Denied. The Hardcore ~~Composites~~ pile is not described by the '889 Patent.
41. Denied. Hardcore ~~Composites~~ and Hemphill have not infringed said patent.
42. Denied. Hardcore ~~Composites~~ and Hemphill have not infringed said patent, therefore there is no basis for belief that there will be future infringement.

Prayer for relief


Wherefore W. Scott Hemphill demands the following relief with respect to this case.

- a. This court enter a judgement that Hemphill and Hardcore Composites have not infringed U.S. Patent # 5,800,889 and further that

Lancaster Composite plagiarized and stole the technical knowledge contained in said patent and rule that Lancaster Composite committed fraud upon the U.S. Patent office and render the patent null and void;

- b. This court enter a judgement that Hemphill and Hardcore Composites have not infringed U.S. Patent # 6,048,594 and further that Lancaster Composite committed fraud upon the U. S. Patent office and render said patent null and void;
- c. That Lancaster Composite be required to pay for all damages suffered by Hemphill and Hardcore Composites as a result of the filing of this action
- d. That Hemphill and Hardcore Composites be granted such further relief which this court deems just and proper, together with any costs and disbursements of this action.

Dated this 10<sup>th</sup> day of March, 2005

  
\_\_\_\_\_  
W. SCOTT HEMPHILL  
517 Riblett Lane  
Wilmington, DE 19808

CERTIFICATE OF SERVICE

I, W. Scott Hempill, Hereby Certify That on  
MARCH 11, 2005, True and correct copies of the  
Within Document were caused to be served  
on the ATTORNEY OF RECORD at the Following Addresses:

George H. Seitz, III

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302-888-0600

W. Scott Hempill

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